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March 8, 2021

By ECF and Electronic Mail  
The Honorable Dora L. Irizarry  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Samantha Shader, 20-CR-202 (DLI)

Dear Judge Irizarry:

Pursuant to the Court's January 13, 2021 scheduling order, the parties are providing a status report to the Court in advance of the status conference scheduled for March 15, 2021 at 12:00 p.m.

Ms. Shader is charged in a seven-count indictment with use of explosives, in violation of 18 U.S.C. § 844(f)(1), arson, in violation of 18 U.S.C. § 844(i), using an explosive to commit a felony, in violation of 18 U.S.C. § 844(h)(1), arson conspiracy, in violation of 18 U.S.C. § 844(n), use of a destructive device, in violation of 18 U.S.C. § 924(c)(1)(B)(ii), civil disorder, in violation of 18 U.S.C. § 231(a)(3) and possessing and making a destructive device, in violation of 26 U.S.C. §§ 5861(d) and 5861(f).

On July 17, 2020, the Court held a status conference and Ms. Shader was arraigned on the pending indictment. That same day, the Court issued a written order granting in part and denying in part the defense motion to inspect grand jury records. On July 23, 2020 and July 28, 2020, the Clerk of the Court provided the grand jury records to the defense and the government. On July 24, 2020, the government provided Ms. Shader with its second Rule 16 discovery production. On August 27, 2020, the government provided Ms. Shader with its third Rule 16 discovery production. On October 28, 2020, the government provided Ms. Shader with its fourth Rule 16 discovery production, which included numerous additional NYPD video files taken from multiple locations. On January 5, 2021, the government provided counsel for Ms. Shader with its fifth Rule 16 production, which included substantial additional materials including surveillance video files, law enforcement records, and forensic reports.

In light of the voluminous discovery provided to counsel, the difficulties of reviewing the discovery with Ms. Shader given the ongoing pandemic and lockdowns at MDC, and because the defense would like the opportunity to provide information to the government that it feels would

inform discussions on the possibility of resolving this case short of trial, the parties request an adjournment of the March 15, 2021 status conference and an additional status conference or control date in 60 days.

Finally, the parties request that the Court exclude time under the Speedy Trial Act. Specifically, the parties request that the Court find that the ends of justice are served by ordering the requested continuance as this continuance outweighs the best interests of the public and Ms. Shader's right to a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). In particular, the need for Ms. Shader to continue to review the voluminous discovery provided to date, discuss that discovery with counsel and the defense can initiate negotiations with the government.

Thank you for your consideration of this letter.

Respectfully Submitted,

/s/

Amanda David  
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cc: all counsel of record (via ECF)  
Clerk of the Court (via ECF)